

Advocates for Workplace Fairness

July 27, 2023

Via CM/ECF

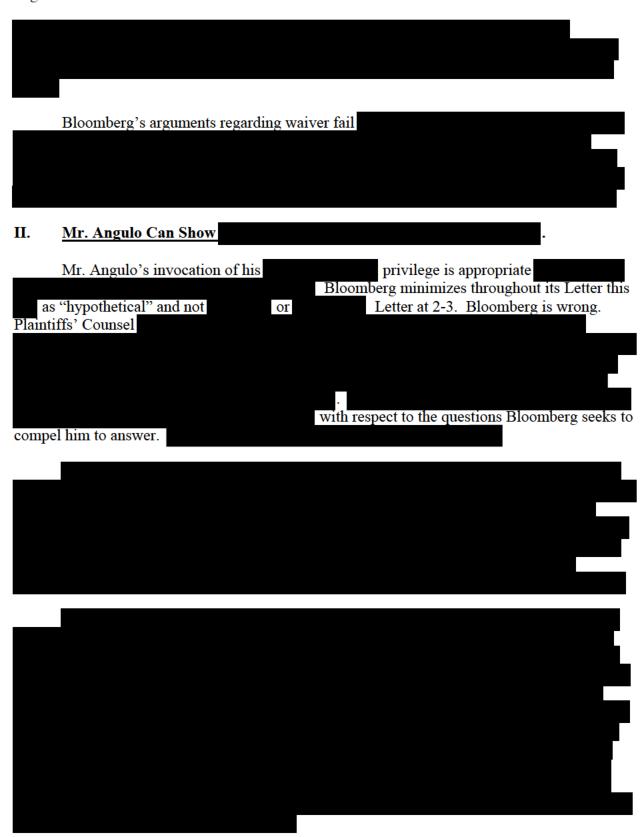
The Honorable Gabriel W. Gorenstein United States District Court for the Southern District of New York 500 Pearl Street New York, NY 1007

Re: Wood et al. v. Mike Bloomberg 2020, Inc., No. 20 Civ. 2489 (LTS)(GWG)

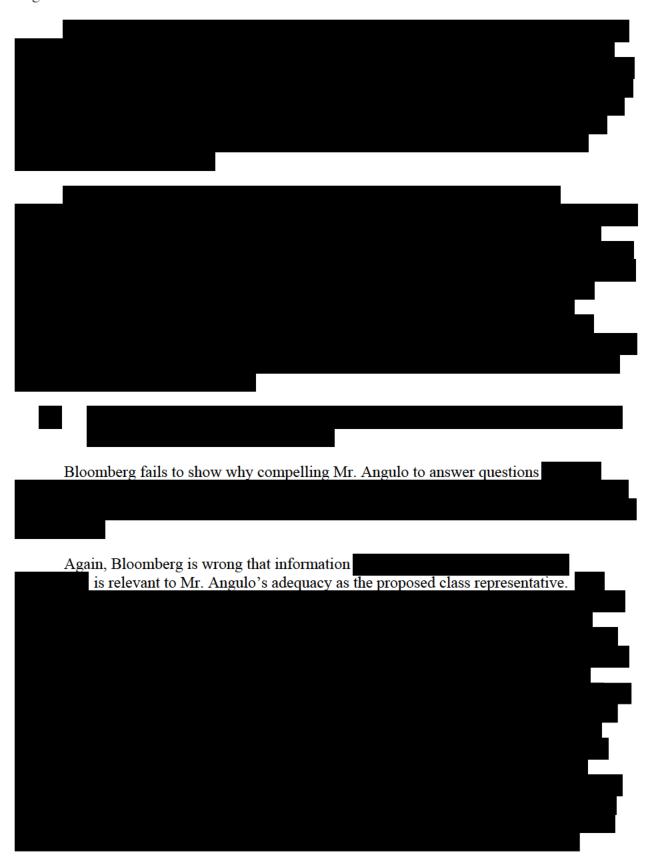
Dear Judge Gorenstein:

| Pursuant to the Rule 2.A. of this Court's Individual Practices, Plaintiffs fil | |
|---|--------------|
| opposition to Bloomberg's request ("Letter") for a pre-motion conference to addr | |
| anticipated motion to compel Plaintiff Tristan Angulo to answer questions related | |
| ECF No. 370. As set forth in Plaintiffs' pri | |
| to Bloomberg's requests to compel Mr. Angulo's testimony, ECF No. 359, Mr. A | ngulo |
| | |
| and can demonstrate a | |
| to sustain the privilege. The Court should | |
| privilege with respect to Bloomberg's anticipated questions. | |
| | |
| I. Mr. Angulo Has Not Waived his Privilege. | |
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| Bloomberg's argument that Mr. Angulo has waived his | privilege is |
| unsupported and contrary to authority in this Circuit. | |
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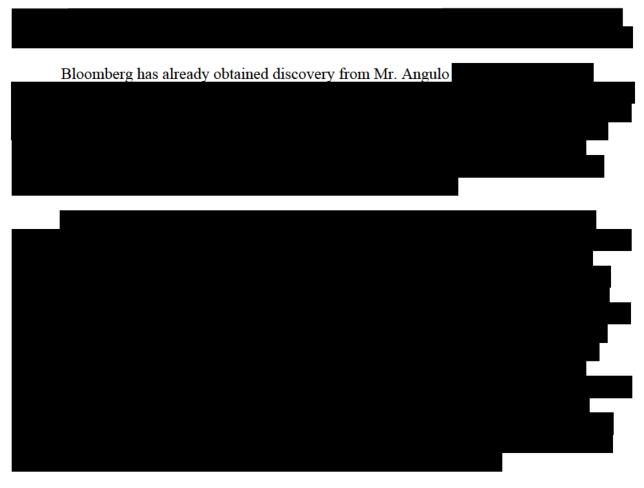
Hon. Gabriel W. Gorenstein July 27, 2023 Page 2 of 4



Hon. Gabriel W. Gorenstein July 27, 2023 Page 3 of 4



Hon. Gabriel W. Gorenstein July 27, 2023 Page 4 of 4



IV. Conclusion

Bloomberg continues its efforts to harass, embarrass and intimidate Mr. Angulo, and to waste the parties' resources needlessly.

Bloomberg's request to

compel Mr. Angulo to answer its questions should be denied.

We thank the Court for its attention to this matter.

Respectfully submitted,

Justin M. Swartz

cc: All Counsel of Record (via ECF)